

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>IN RE:</b>  <b>FIELDWOOD ENERGY LLC, et al.,</b>  <b>DEBTORS.</b>	§ § § § § § §	<b>Case No. 20-33948 (MI)</b>  <b>CHAPTER 11</b>
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**NOTICE OF CONTINUATION AND PERFECTION OF LIENS AND PRIVILEGES IN  
CERTAIN PROPERTY OF THE DEBTORS' ESTATES  
PURSUANT TO 11 U.S.C. § 546(b)**

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Deligans Valves, Inc. ("*Deligans*"), appearing herein through undersigned counsel, hereby provides written notice pursuant to 11 U.S.C. § 546(b) of the continuation and perfection of interests in certain property of the estates of the Debtors Fieldwood Energy, LLC, et al.<sup>1</sup> (together, the "*Debtors*"), and in the proceeds, products, offspring, rents, or profits of such property, and in support thereof, respectfully represents:

1. Prior to the filing of voluntary chapter 11 petitions by the Debtors on August 3, 2020 and August 4, 2020, Deligans provided rental equipment, goods, and associated services to the Debtors in support of the Debtors' digging, drilling, torpedoing, operating, completing, maintaining, and/or repairing oil and/or gas wells in connection with the oil and gas leases listed on the following page (collectively, the "*Oil & Gas Properties*");

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Holdings LLC (9264); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors' primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

a. **SOUTH MARSH ISLAND-128**

Lease#: OCS-G-02587  
Area/Block: SMI-128  
Parish: IBERIA/VERMILION/TERREBONNE

b. **WEST DELTA-95**

Lease #: OCS-G-01497  
Area/Block: WD-95 X  
Parish: PLAQUEMINES/LAFOURCHE/JEFFERSON

c. **GRAND ISLE-47**

Lease #: OCS-G-00133  
Area/Block: GI-47 A  
Parish: PLAQUEMINES/LAFOURCHE/JEFFERSON

d. **MAIN PASS-140**

Lease #: OCS-G-02193  
Area/Block: MP-140A  
Parish: PLAQUEMINES

e. **MAIN PASS-153**

Lease#: OCS-G-01967  
Area/Block: MP-153C  
Parish: PLAQUEMINES

f. **BRAZOS- 105**

Lease#: OCS-G-01757  
Area/Block: BA 105 A  
County: MATAGORDA

g. **SOUTH MARSH ISLAND- 106**

Lease#: OCS-G-03776  
Area/Block: SM-106A  
Parish: IBERIA/VERMILION

h. **GRAND ISLE- 41**

Lease#: OCS-G-00129  
Area/Block: GI-41 B  
Parish: PLAQUEMINES/LAFOURCHE/JEFFERSON

i. **GRAND ISLE- 41**

Lease#: OCS-G-00130  
Area/Block: GI-41 B  
Parish: PLAQUEMINES/LAFOURCHE/JEFFERSON

j. **MAIN PASS 311**

Lease#: OCS-G-02213  
Area/Block: MP 311 A & B  
Parish: PLAQUEMINES

k. **SHIP SHOAL- 193**

Lease#: OCS-G-13917  
Area/Block: SS 193 A  
Parish: TERREBONNE

l. **WEST DELTA- 103 F**

Lease#: OCS-G-00840  
Area/Block: WD 103 F  
Parish: PLAQUEMINES

2. Pursuant to the Louisiana Oil Well Lien Act, La. R.S. § 9:4861, *et seq.*, Deligans timely preserved and perfected its liens and privileges over each of the Oil & Gas Properties, including but not limited to, the wells, buildings, pipelines, constructions, and other facilities thereon, by filing the lien affidavits attached hereto in Exhibits 1-5 (collectively, the “*Deligans Lien Affidavits*”):

a. **SOUTH MARSH ISLAND 128:**

- i. Recorded in Terrebonne Parish, State of Louisiana (10.13.2020): File No. 1612425, Book 3188, Folio 532. Attached hereto as **Exhibit 1**.

ii. Recorded in Vermilion Parish, State of Louisiana (10.13.2020): File No. 2020-007190. Attached hereto as **Exhibit 2**.

iii. Recorded in Iberia Parish, State of Louisiana (10.13.2020): File No. 2020-00013087, Book 1924, Folio 270. Attached hereto as **Exhibit 3**.

b. **WEST DELTA 95:**

i. Recorded in Lafourche Parish, State of Louisiana (11/16/2020): File No. 1305980, Book 2088, Folio 769. Attached hereto as **Exhibit 4**.

ii. Recorded in Plaquemines Parish, State of Louisiana (11/16/2020): File No. 2020-00004813, Book 781, Folio 959. Attached hereto as **Exhibit 5**.

iii. Recorded in Jefferson Parish, State of Louisiana (11/16/2020): File No. 12057395, Book 4905, Folio 42. Attached hereto as **Exhibit 6**.

c. **GRAND ISLE 47:**

i. Recorded in Plaquemines Parish, State of Louisiana (11/16/2020): File No. 2020-00004812, Book 781, Folio 949. Attached hereto as **Exhibit 7**.

ii. Recorded in Jefferson Parish, State of Louisiana (11/16/2020): File No. 12057394, Book 4905, Folio 41. Attached hereto as **Exhibit 8**.

iii. Recorded in Lafourche Parish, State of Louisiana (11/16/2020): File No. 1305979, Book 2088, Folio 759. Attached hereto as **Exhibit 9**.

d. **MAIN PASS 140:** Recorded in Plaquemines Parish, State of Louisiana (11/16/2020): File No. 2020-00004814, Book 781, Folio 968. Attached hereto as **Exhibit 10**.

e. **MAIN PASS 153:** Recorded in Plaquemines Parish, State of Louisiana (11/16/2020): File No. 2020-00004815, Book 781, Folio 974. Attached hereto as **Exhibit 11**.

f. **BRAZOS 105:** Recorded in Matagorda County, State of Texas (12/14/2020): Document No. 2020-1214000030. Attached hereto as **Exhibit 12**.

g. **SOUTH MARSH ISLAND 106:**

- i. Recorded in Iberia Parish, State of Louisiana (12/14/2020): File No. 2020-00010049, Book 1932, Folio 521. Attached hereto as **Exhibit 13**.
- ii. Recorded in Vermilion Parish, State of Louisiana (12/14/2020): File No. 2020-17233. Attached hereto as **Exhibit 14**.
- h. **GRAND ISLE 41 (OCS-G-00129):**
  - i. Recorded in Plaquemines Parish, State of Louisiana (1/12/2021): File No. 2021-00000164, Book 786, Folio 507. Attached hereto as **Exhibit 15**.
  - ii. Recorded in Lafourche Parish, State of Louisiana (1/12/2021): File No. 1309117, Book 2103, Folio 395. Attached hereto as **Exhibit 16**.
  - iii. Recorded in Jefferson Parish, State of Louisiana (1/12/2021): File No. 12102157, Book 4913, Folio 850. Attached hereto as **Exhibit 17**.
- i. **GRAND ISLE 41 (OCS-G-00130):**
  - i. Recorded in Plaquemines Parish, State of Louisiana (1/12/2021): File No. 2021-00000165, Book 786, Folio 523. Attached hereto as **Exhibit 18**.
  - ii. Recorded in Lafourche Parish, State of Louisiana (1/12/2021): File No. 1309118, Book 2103, Folio 411. Attached hereto as **Exhibit 19**.
  - iii. Recorded in Jefferson Parish, State of Louisiana (1/12/2021): File No. 12102158, Book 4913, Folio 851. Attached hereto as **Exhibit 20**.
- j. **MAIN PASS 311:** Recorded in Plaquemines Parish, State of Louisiana (1/12/2021): File No. 2021-00000162, Book 786, Folio 489. Attached hereto as **Exhibit 21**.
- k. **SHIP SHOAL 193:** Recorded in Terrebonne Parish, State of Louisiana (1/12/2021): File No. 1618190, Book 3212, Folio 68. Attached hereto as **Exhibit 22**.
- l. **WEST DELTA 103:** Recorded in Plaquemines Parish, State of Louisiana (1/12/2021): File No. 2021-00000163, Book 786, Folio 501. Attached hereto as **Exhibit 23**.

3. In accordance with 11 U.S.C. § 546(b)(1), Deligans hereby perfects, maintains or continues the perfection of and provides notice of intention to enforce its liens and privileges (the “**546 Interests**”) in the Oil & Gas Properties, together with such other property described in the Deligans Lien Affidavits and set forth in La. R.S. § 9:4861(12)(c) (collectively with the Oil & Gas Properties, the “**Encumbered Properties**”), and provides notice of its intention to enforce such liens and privileges with respect to such Encumbered Properties. The 546 Interests perfected, maintained, and/or continued hereby extend in and to the proceeds, products, offspring, rents, or profits of such Encumbered Properties.

4. Deligans further provides notice that it objects and does not consent to (a) any effort to prime its perfected 546 Interests against the Encumbered Properties or any other property of Debtors’ estates; and (b) any use of cash collateral that is the proceeds of hydrocarbons produced from the Encumbered Properties.

5. Deligans reserves the right to request relief from the automatic stay of 11 U.S.C. § 362, or any other appropriate relief, to enforce and defend its perfected 546 Interests against the Encumbered Properties or any other property of the Debtors’ estates.

6. This Notice shall not be deemed an admission that any filing is necessary to perfect or maintain perfection of the 546 Interests under the Bankruptcy Code, the Louisiana Revised Statutes, or any other applicable law.

7. Deligans reserves the right to supplement or amend this Notice, including the amounts owed and to itemize any further attorneys’ fees, costs, interest, or other amounts recoverable under applicable law.

8. Deligans files this Notice without limitation or waiver of any rights, claims, and defenses against Debtors, their bankruptcy estates, and any third parties.

Respectfully Submitted,

LUGENBUHL, WHEATON, PECK,  
RANKIN & HUBBARD

/s/ Benjamin W. Kadden  
BENJAMIN W. KADDEN  
Texas Bar No. 24077542  
601 Poydras Street, Suite 2775  
New Orleans, LA 70130  
Telephone: (504) 568-1990  
Facsimile: (504) 310-9195  
Email: [bkadden@lawla.com](mailto:bkadden@lawla.com);

*Counsel for Deligans Valves, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served a true and correct copy of the above and foregoing *Notice of Continuation and Perfection of Liens and Privileges in Certain Property of the Debtors' Estates Pursuant to 11 U.S.C § 546(b)* via Notice of Electronic Filing on this 6<sup>th</sup> day of February 2021.

/s/ Benjamin W. Kadden